

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
(Eastern Division)

In re:

ANDRE BISASOR,

Debtor.

Chapter 7
No. 15-13369-JNF

APPLICATION OF CHAPTER 7 TRUSTEE TO EMPLOY COUNSEL

TO THE HONORABLE HONORABLE JOAN N. FEENEY,
UNITED STATES BANKRUPTCY JUDGE

John J. Aquino, the duly appointed Chapter 7 trustee (the "Trustee") of the estate of Andre Bisasor, the debtor herein (the "Debtor"), hereby submits this application for authority to retain the law firm of Anderson Aquino LLP as counsel to the Trustee. In support of this Application, the Trustee respectfully represents as follows:

1. On Aug 27, 2015 (the "Petition Date"), the Debtor filed a voluntary petition for relief under Chapter 13 of the United States Bankruptcy Code, 11 U.S.C §101 *et seq.* (the "Bankruptcy Code"). . On January 6, 2016, the Court entered an Order converting the Debtor's Chapter 13 case to a case under Chapter 7 of the Bankruptcy Code. Thereafter, the Trustee was appointed Chapter 7 Trustee by the United States Trustee for the District of Massachusetts and continues to serve in that capacity.

2. The Trustee hereby applies for authority to employ the law firm of Anderson Aquino LLP as his attorneys under a general retainer for services to be rendered regarding the following:

(a) To assist, advise and represent the Trustee in the administration of this case;

(b) To assist, advise and represent the Trustee in any investigation of the acts, conduct, assets, liabilities and financial condition of the Debtor, and to direct the activities of accountants and other professionals that are employed by the Trustee;

- (c) To assist, advise and represent the Trustee with respect to the prosecution or defense of any action brought by or against the estate;
- (d) To assist, advise and represent the Trustee with respect to the allowance or disallowance of any claims filed against the Debtor's estate;
- (e) To assist, advise and represent the Trustee with respect to the collection and liquidation of the Debtor's assets and any other matters relevant to this proceeding; and
- (f) To assist, advise and represent the Trustee in connection with any other matters that may be necessary and appropriate in the administration of this case.

3. Subject to Court approval, the firm will charge for services rendered at its usually hourly rates, which are \$120.00 per hour for paralegals and between \$285.00 and \$375.00 per hour for attorneys, depending upon their level of experience.

4. To the best of the Trustee's knowledge, information and belief, none of the members of Anderson Aquino LLP have any connection with the Debtor, his creditors or any other party-in-interest, and represent no interest adverse to the Debtor's estate in the matters for which it is to be retained, other than as may be set forth in the affidavit of John J. Aquino, submitted herewith.

WHEREFORE, the Trustee respectfully requests that this Court enter an Order:

- (i) Authorizing the Trustee to employ and retain the law firm of Anderson Aquino LLP as his counsel, to perform the legal services recited herein; and
- (ii) Granting such other and further relief as this Court deems just and proper.

John J. Aquino, Chapter 7 Trustee

/s/ John J. Aquino
John J. Aquino, Esq. (BBO #563260)
Anderson Aquino LLP
240 Lewis Wharf
Boston, MA 02110
(617) 723-3600
jj@andersonaquino.com

Dated: May 6, 2016
Boston, Massachusetts